

I've reviewed the Comments filed by HOVRS (Docket 03-123 In re Telecommunications Relay Services and Speech to Speech Relay Services for Individuals with Hearing and Speech Related Disabilities) dated May 15, 2007.

(HOVRS Comments

[http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native\\_or\\_pdf=pdf&id\\_document=6519411431](http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519411431))

I have been concerned about Sorenson media's questionable, but legal, business practices in the VRS arena and the failure of FCC to take corrective action in a timely manner ever since Sorenson installed their VP-100 in the homes of Deaf and Hard of Hearing people that blocked access to other VRS providers. This failure to act quickly has led to a playing field that is not level for all VRS providers and it leads me to wonder how FCC failed to see this happening. I have sent numerous filings over the years complaining about this blockage of access to other providers, which has been partially, but almost too late, corrected. But until a uniform number system which will enable all VPs to connect with all VRS providers and point to point connections between different brands of VPs via proxy TNs, such as proposed by Neustar and Sprint, is soon in operation, until the manufacturing of VPs is separated from the provision of VRS is required (Sorenson developed the VP100/200 which they provide free to deaf and hard of hearing users and are not available for sale to hearing users as well as provide VRS!), and until the excessive profit over and above the built in 11.25 percent allowed as part of operating costs, the playing field for all VRS providers will not be level. I am shocked that Sorenson alone averages approximately 4 MILLION minutes per month whereas the remaining 10 VRS providers averages a TOTAL of 1 MILLION minutes per month or an average of 100,000 minutes/mo per provider! FCC needs to take some responsibility for allowing this to occur due to their delay in taking various corrective actions in a timely manner.

(Above data obtained from  
<http://neca.org/media/0407MarchdataTRSstatus.pdf>

In view of the above, I wholeheartedly support HOVRS proposal of a tiered rate structure based on minutes per use per month, which will result in fair compensation to all VRS providers without unjustly enriching any provider. In closing I encourage FCC to read carefully Chapter IV about the proposed multi-tiered VRS rate. If FCC is not able soon to take this kind of corrective action, then at the very least, they should consider the simplified tiered approach for the 2007-2008-fund year as proposed in Chapter V.